

REMARKS

Claims 1 - 17 have been previously canceled and claims 18 - 23, 25 - 26, 28 - 33 are currently amended. No new claims have been added by way of this response. Thus, claims 18 - 33 are still currently pending and presented for examination. Applicant respectfully requests reconsideration and allowance of the pending claims in view of the foregoing amendments and the following remarks.

Response to Objections:

The drawings were objected to as missing legends for a better understanding of the invention. Applicant has amended the drawings accordingly, thereby overcoming the objections.

Applicant has also address all claim informalities identified by the Examiner.

Applicant requests that all objections be withdrawn.

Response to Rejections Under Section 102:

Claims 18 - 22 and 25 - 33 are rejected under 35 U.S.C. §102(b) as being anticipated by Rosen et al. In view of the above-amendments and following remarks, Applicant respectfully requests the rejection be withdrawn.

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. The identical invention must be shown in as complete detail as contained in the claim. The elements must be arranged as required by the claim.

To facilitate the reconsideration of the rejection, the following discussion of the invention as claimed is presented herein for the Examiner's kind consideration and review.

Claim 18 recites (and similarly claim 33), in part:

"...a routing table for each node ... wherein each routing table comprises next hop data for each pair of ingress/egress nodes"

"...assigning a label to a data packet ... representing the ingress node and an egress node"

"... alternative routes for the forwarding of the data packet in the routing table for each pair of ingress/egress nodes when an alternate next hop is available"

Accordingly, it can be seen that the invention as claimed uses a modified routing table scheme wherein the routing table entries are stored as "pairs" of ingress/egress nodes. In this manner, with only ingress/egress node data in the label for the packet (not full path information as in MPLS Explicit Routing), a unique set of routing tables can be used that not only require fewer entries but also prevent looping and allow for local decisions.

With this background in mind, the following detailed discussion of the cited and applied reference, *Rosen*, is presented herein for the Examiner's kind consideration.

Rosen expressly discloses that MPLS protocol architecture supports two options for Route Selection: (1) Hop by hop routing, and (2) Explicit routing [*Rosen*, page 17]. The present invention does not provide for Explicit Routing since the packets are not labeled with full path data.

Hop by hop routing allows each node to independently choose the next hop for the path for a stream. [*Rosen*, page 17]. Hop by hop routing is defined on page 36 of *Rosen*: "In general, router R determines the next hop for packet P by finding the address prefix X in its routing table which is the longest match for P's destination address. That is, the packets in a given Stream are just those packets which match a given address prefix in R's routing table. In this case, a Stream can be identified with an address prefix. If packet P must traverse a sequence of routers, and at each router in the sequence P matches the same address prefix, MPLS simplifies the forwarding process by enabling all routers but the first to avoid executing the best match algorithm; they need only look up the label."

The present invention, by using unique routing tables with routing table entries stored as "pairs" of ingress/egress nodes, does not utilize hop by hop routing, either.

Therefore, claims 18 and 33 are not anticipated by *Rosen* and Applicant respectfully requests the Examiner withdraw the Section 102 rejections.

Response to Rejections Under Section 103:

Certain claims were further rejected under 103 as being obvious over *Rosen* in view of *Delaney* and/or *Cisco*. In view of the above-amendments and following remarks, Applicant respectfully requests the rejection be withdrawn.

To establish *prima facie* obviousness of a claimed invention, all words in a claim must be considered for judging the patentability of the claim against the prior art. Applicant has already shown that *Rosen* does not teach or suggest labels using routing table entries with "pairs" of ingress/egress nodes for next hop and alternate hop data. Neither *Delaney* nor *Cisco* remedies the shortcomings of *Rosen*. The omission of these elements in the prior art thus precludes a finding of obviousness.

For at least the reasons discussed in connection with the Section 102 rejections, Applicant respectfully submits that the remaining claims are patentable at least based on their dependence from claims 18 as well as based on their own merits. Therefore, Applicant respectfully requests that the Examiner withdraw the Section 103 rejections and timely pass the application to allowance.

Conclusion

Accordingly, Applicant submits that all claims are in condition for allowance and request that a Notice of Allowance be issued. The commissioner is hereby authorized to charge any appropriate fees due in connection with this paper, including the fees specified in 37 C.F.R. §§ 1.16 (c), 1.17(a)(1) and 1.20(d), or credit any overpayments to Deposit Account No. 19-2179.

Respectfully submitted,

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